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 Subject:
 DDT and Zinc

 Date:
 08/12/2008 04:48 PM

I had limited time to review these TRVs.

<u>DDT (Fish):</u> Please review DEQ's database, as there are at least three papers that were not included (Cuerrier et al., 1967 and Hoptkins et al., 1969 - rainbow trout LOER 1.27). Our database shows 3 Cuerrier references, two for 1987 and one for 1976. Two are fathead minnow studies, and one is a rainbow trout study. It looks like only the rainbow trout study was included here. The two fathead minnow studies give LOERs of 24 and 57 ug/g. Please indicate if there was a reason to exclude them.

Our guidance value SSD was calculated as 0.115 mg/kg (upper conf. 0.172 mg/kg) and the values here are 0.64 mg/kg (5th) and 0.94 (10th). Since our upper confidence was so much lower than the 5th percentile value, there is a concern that the quality of some of the studies are inappropriate to drive the SSD. DEQ's use of studies that bounded NOER / LOER within the same study is a measure of study quality, and relevance to application in the PNW (e.g. coldwater fish). This dataset also seems to be dominated by mortality studies, and in many cases an ACR was not used. Why? The selection of a more balanced endpoints for the SSD in order to avoid the quantity of mortality studies driving the SSD should be explored, as the low end of the effects range needs to be better represented.

I also didn't see (but may have missed it) a review of the relevancy of this TRV to salmonid species.

DDT (inverts): I did not have time to review.

Zinc (fish and inverts): I did not have time to review.

On a side note, after tomorrow I will be out until Sept. 2nd. Therefore, I may not be able to review the remaining TRVs. I will try to send some comments tomorrow, but please consult DEQ's database for the remaining chemicals as DEQ's comments.

-Jennifer